SECTION 5.0 - Central Office Code Administration	REQUIREMENT	PROPOSAL
5.1 General Responsibilities	Develop knowledge of local environments and relationship with local regulators	CCMI, in maintaining its product line, has a firm understanding of the local telecommunications market as it relates to calling areas, carriers and dialing plans; however, we recognize there are many other factors to be considered. Our proposal includes a CO Code Transition Manager, who will be in place coincident with the start of the NANP transition. The manager will be responsible for meeting/interviews with local CO Code administrators to asses local factors and recommend an appropriate organizational structure.
5.2 Central Office Code Administration Functional Requirements		
5.2.1.General Client Services	1. Information on processes, procedures, and services 2. Information/provide documents - web, electronic or paper 3. Suggest alternatives, optimize utilization 4. Knowledge of local dialing plans 5. Assist in completing forms 6. Respond to inquiries on available codes	CCMI will comply
5.2.2 Central Office Code Request Processing	1. Process applications - compliance, eligibility, clarification or additional information 2. Assigns codes 3. Conservation 4. Avoids conflicts in dialing, routing, rating 5. Obtains local dialing plans, maintains	CCMI will comply

	records on assignments 6. Within time frames 7. Verify in service within time frames 8. Adapts to guideline or regulatory changes	
5.2.3 Industry Notification Functions	1. Notification of assignments per CO Code Assignment Guidelines 1. Capability to input rating and routing data into RDBS and BRIDS 2. Assist in call completion problems	CCMI will comply
5.2.4 NPA Relief PLanning	1. Identifies need and timing 2. Communicates with all affected industry member and appropriate regulatory bodies 3. Prepares Initial Planning Document 4. Conducts NPA Relief Meetings, obtain endorsement of regulatory authorities on relief plan and date 5. Plans, notifies, and moderates relief planning meetings 6. Identifies possible relief options and methods 7. Qualifies impacts, advantages and disadvantages of alternatives 8. Submits results of industry consensus or non-consensus to regulatory body, get assistance as needed 9. Provide testimony 10. Assigns new NPA per relief plan 11. Provides industry notification on relief plan activities 12. Prepares press releases 13. Assists NASC in modification of 800/888 toll free database	CCMI will comply
5.2.5 Jeopardy NPA Processes	1. Determine when to declare a jeopardy condition 2. Notifies appropriate regulatory	CCMI will comply

	authorities and affected parties 3. Invokes special conservation procedures 4. Calls and conducts jeopardy NPA Industry meetings 5. Collects and compiles jeopardy COCUS forms 6. Implements extraordinary NPA conservation measures per local industry or regulatory direction	
5.3 Central Office Code Transition	Develop transition plan in conjunction with CO Code Transition Task Force and current CO Code Administrators	CCMI will work with the CO Code Transition Task Force and current CO Code Administrators to develop and recommend a transition plan to the NANC. Our initial concept is a phased implementation of the several current CO Code operations. We believe the two specific items are critical. First, evaluating existing system used for CO Code assignment and successfully negotiating an agreement for on-going use. Second, quickly reaching a decision on staffing and organization. Our expectation is that in the early stages, a centralized organization will be most efficient. Longer term , we anticipate evolving to a regional organization, especially for activities concerning NPA Relief.
5.3.1	Addresses staffing, cross-training, hand-off schedules, methods to address local and toll dialing status, cross-boundary local calling requirements	See 5.1 above; additionally, we anticipate recruiting some NANPA staff from the existing CO Code Administration groups (regardless of a centralized or regional organization).
5.3.2	Describe process for transferring supporting information	CCMI will assign a transition manager to each CO Code group to facilitate and

		verify to transfer of all documents, schedules and supporting materials. After the transfer, we'll establish a process for referrals of calls and the forwarding of mail.

SECTION 6.0 - Dispute Resolution	REQUIREMENT	PROPOSAL
6.0 Dispute Resolution	1. Provide information as required to the appropriate responsible group and participant as required in resolution of an issue	CCMI will provide information as requested and directed, and will participate in dispute resolution as directd by the NANC. As of submission of this proposal, the NANC had made issue a decision regarding the NANPA's role in dispute resolution

SECTION 7.0 - Enterprise Services	REQUIREMENT	PROPOSAL
7.1 Operating Principles	Follow operating principles which apply to provision of enterprise services	
7.2 Required Enterprise Service	1. Provide rating and routing input to RDBS/BRIDS for code applicants that request service 2. Proposed fee to be charged to the applicant requesting service	1. CCMI will offer the required Enterprise Service effective with NANC's approval of the CO Code Administration Transition Plan. 2. The fee for the required Enterprise Service is
7.4 Auditing	Audit of enterprise service activities and report on annual basis to the NANC	CCMI will provide an annual report of all required and optional Enterprise Service, to include a description of the services and fee schedule.

SECTION 8.0 -Billing and Collection Agency Functional Requirements	REQUIREMENT	PROPOSAL
8.1 Introduction	Demonstrate compliance with stated sections	UCG's billing systems presently process more than 1 million transactions each month, rendering 125,000 invoices, statements and renewal notices in the process. Invoices can be rendered via mail, fax, e-mail and automatic electronic debiting. The NANP Billing & Collection function will be maintained as part of the UCG central billing staff, augmented by a dedicated Billing & Collections coordinator on the NANPA staff.
8.2 General Responsibilities	1. Collect payments for numbering administration functions 2. Assess carrier payments 3. Base non-U.S. payments on nation's population 4. List of U.S. telecommunication carriers 5. All U.S. carriers contribute to cost recovery	CCMI will comply
8.3 Qualities and Attributes	1. Knowledge of relevant legislation 2. Knowledge of relevant FCC rules related to number administration, fund collection and reporting requirements 3. Knowledge of generally accepted accounting standards and laws 4. Knowledge and understanding of cost recovery mechanisms	CCMI will comply

8.4 Billing and Collection Functional Requirements	1. Design reporting worksheet 2. Submit worksheet to NANC and FCC for approval 3. Understand and follow public notice requirements in disseminating worksheet 4. Develop procedures for monitoring industry compliance 5. Compute payment for each contributing entity 6. Develop corporate and international contacts to facilitate cost recovery 7. Propose procedures addressing reporting and payment failures 8. Develop procedure for computing, billing, and collecting each entity's payment to fund 9. Design procedures to ensure validity of reported data 10. Establish procedure for collecting and verifying installment payments 11. Develop procedure regarding variances in fund collection and disbursements 12. Implement Billing and Collection function within 90 days of selection 13. Collect payment for NANPA function and Billing and Collection Agency function 14. Distribute funds to the new NANPA on a monthly basis 15. File annual report with the FCC and national government authorities as appropriate on collections and disbursements	CCMI will comply

	16. Maintain records to ensure operational integrity 17. Obtain audit	
8.5.2 U.S Payments	1. Verify information on complete worksheet 2. Calculate payment factor, calculate each individual carrier required payment and submit the bill 3. Examine and verify data received from carriers 4. Ensure all eligible entities are identified, billed and contribute to the fund 5. Keep carrier data confidential and do not use data except for purposes of calculating, collecting and verifying payment	CCMI will comply with the following exception. Shortfalls in total carrier payments in any 12-month billing cycle, due either to carriers no longer participating or to non-payments during the year, will be calculated and added to the next year's assessment. The assessment will be a one-time payment due in the first quarter on the next 12-month billing cycle

SECTION 9.0 -Miscellaneous	REQUIREMENT	PROPOSAL
9.1 Hours of Operation	1. 5 days a week, 8 hours a day. 2. Mechanism for 24 hour accessibility 3. Respond within 1 business day	1. CCMI will staff the NANPA office 5 days a week, 10 hours a day (8am -6pm ET) 2. CCMI will establish an e-mail and "out-of-hours" voice mail address to guarantee 24 hour accessibility. 3. CCMI will comply.
9.2 Telecommunications Requirements	1. Description of voice communications and computer facilities 2. Each staff have individual phone with message capability 3. Access to rating and routing databases	1. CCMI , as a division of UCG, shares communications and computer facilities office space with other UCG divisions and central support staff.. Voice telecommunications services consist of long distance inbound and outbound services from AT&T, Worldcom, Bell Atlantic, Sprint and MCI Metro. The office is served by a Mitel SX 2000 PBX, with integrated voice mail. Computer facilities consist of dedicated computer space equipped with stand alone air handling, raised floor and uninteruptable power supply (UPS). CCMI systems are house on a DEC VAX (currently being migrated to a DEC Alpha Server). Internal NANPA systems will be maintained on a separate server, accessible only to authorized NANPA personnel; the NANPA website will be maintained on a separate server, and there will be one fully redundant server as back up for either the internal or website server. Billing and collection systems will be maintained within the UCG centralized staff. with secured access to NANPA confidential information.

		2. Each NANPA staff member will have a separate DID line equipped with voice mail. 3. CCMI will arrange for access to the Bellcore rating and routing database effective with the beginning of the NANPA 90 day transition period.
9.3 Security Requirements	1. Proper security measures 2. Secured work area with limited access	1. See 2-5 below. 2. The CCMI work area is fully secured with key-card access for selected personnel for access outside of normal business hours. In addition, computer systems hardware is housed in a secured passcode protected environment with access limited to specific systems and administrative personnel.
	3. Secured record retention 4. Secured computer systems for proprietary information	3. All NANPA records will be secured within the CCMI work area. 4. All NAPA systems and data will be maintained on a dedicated server (with hot-spare backup). The server will be protected by a firewall to insure protection from any connected telecommunications facilities.
	5. Disaster recovery plans and procedures	5. All NANPA systems will be subject to UCG standard disaster practices, which include daily back-up and off-site storage of all systems programs and data, 24 hours emergency notification procedures for staff, and full environmental systems backup.
9.4 Staffing Requirements	1. Permanent, full time	1. All NAPA staff will be permanent. Our proposal is based on full-time positions; however, we propose the NANPA have the flexibility to hire part-time staff as circumstances warrant.

	2. Sufficient level for quick responses	2. Minimally, the NANPA will staffed during our normal business hours, Monday-Friday, 8am-6pm. Permanent or temporary adjustments to this schedule will be made based on the needs of the industry, NANPA performance goals and standards and historical levels of activity.
	3. Physical location	3. Initially, the NANPA staff will be located at UCG's headquarters location in Rockville, MD. We also plan to investigate remotely locating some personnel on a regional basis. This would apply particularly to staff members involved in activities like NPA Relief Planning, where we expect a high level of meeting activity and regulatory interaction. Decisions on a regional operation will be made during the formulation and implementation of the CO Code Transition Plan.
	4. Ability to travel 5. Staffing profiles and levels	4. NANPA staff will travel as necessary. 5. When all NPA and Code Administration functions are transitioned fully, the staff will consist of: One (1) Director, three (3) Managers, seven (7) Relief Planners, twelve (12) Code Administrators and one (1) Systems Administrator. In addition, NANPA staff will be supported by UCG's centralized billing, accounting, and information technology staffs.
		1. NANPA will be established as department within CCMI, UCG's Telecom Information Division. All NANPA activities will be managed directly within this organization. Support activities (billing/collection, accounting, human

		resources and legal) will be provided by the United Communications Group centralized functional staffs. 2. In the initial stages, NANPA activities will be centralized when transition planning and implementation activities are underway. Once the NANPA has assumed all NPA and CO Code responsibilities, a regional organization will be evaluated, with the expectation that a regional structure will be more efficient and cost effective especially concerning NPA Relief Planning. 3. Anticipated NANPA staff when all responsibilities have been transferred is twenty-four (24), plus centralized United Communications Group support staff.
9.6 Reporting Requirements		
9.6.1 NANP Number Resource Reports	1. Reports on semi-annual basis to NANP distribution list on assignments, assignment rates, trends, projections, triggers Jeopardy resources depleted within 2 years shall have monthly reports	1. CCMI will issue semi-annual reports.
9.6.2 North American Numbering Plan Administration Annual Report	Publish annual report	
9.6.3 NANPA Web Site	Update at least weekly the following web site information 1. NANPA 2. NPA 3. NPA-NXX code 4. 900 NXX 5. 500 NXX 6. CIC 7. VSC 8. 456 NXX 9. ANI II	CCMI will establish a NANPA website and will update all information weekly, at a minimum.

	10. 555 XXXX 11. N11 12. 800-855 13. New number resources as defined 14. INC guidelines 15. NANPA Informational Letters 16. NANPA information as directed by NANC or regulatory authority 17. Recent NANPA reports (last 6 months of NANPA reports and annual report to the NANC)	

SECTION 10.0 - Pricing	REQUIREMENT	PROPOSAL
Pricing	5 year proposal separated into: NANPA functions CO Code functions Billing and Collection Agency function	 NANPA = CO Code = Billing & Collection =
	Total Solution (if applicable)	Total Solution =
	American dollars, exclusive of taxes, custom duties, tariffs	CCMI complies.
	Preferred or most favored customer pricing, including decreases during term	CCMI guarantees most favored customer pricing for like quantities of the same or substantially similar services.

Section 3.0 - NANPA Qualities and Attributes

The Requirements Document demands two essential skills of the NANPA - the ability to acquire, manage and disseminate information and an understanding of the telecommunications network particularly with regard to the management of number resources. CCMI meets those demands.

First and foremost, CCMI is a publisher of telecommunications information, and is supported by UCG, a company with twenty years experience providing critical information to a variety of industries. Our success and growth is based on one overriding factor - - content. Accurate and up-to-date content, provided in a format that meets a client's (or industry's) needs, supported by first class client support and service is the true measure and determinant of a company's ability. CCMI and UCG are leaders in their field because of this focus... and we will bring that focus to the role of NANPA.

The Requirements Document lists nine specific qualities and attributes. CCMI's capabilities in each area are discussed below:

Knowledge of Network Operations - CCMI's databases are used by call accounting companies, cellular billing companies, interexchange carriers, ILECs and CLECs and internet service providers. The applications center on rating and billing calls. They all require CCMI staff to understand local calling areas, dialing plans, rate center and wire center data, CO code assignment, and tracking and reporting NPA changes. Our clients' businesses and applications rely on CCMI's ability to acquire this data from tariff documents and other industry sources, represent it in our products, and provide fast, dependable customer service to answer questions and resolve problems. While our

experience is more oriented toward external users of the data rather than internal, industry

users, the core set of data is similar. This expertise translates well to NANPA.

Capability to Act as Information Resource

CCMI, as a requirement of our current business, follows numbering issues closely,

particularly as they relate to end users. For example, during the introduction of INPAs,

we reported on the issue extensively in our newsletters, and conducted several conferences

(the present NANPA as well as the INC participated in each conference). Our clients rely

on us to understand numbering issues, and adapt our products to insure the applications

we support properly reflect the numbering plan. We recognize however the critical

ministerial aspects of NANPA and will fill that need by recruiting personnel with

in-depth experience and expertise in representing NANPA.

Systems Capability - CCMI was acquired by UCG in 1990, and is just one example of

UCG's growth through acquisition strategy. As a result, UCG has an extraordinary

level of experience evaluating existing systems, consolidating diverse systems,

integrating systems into UCG's overall Information Technology Group, and developing

new systems. In the past several years, one UCG Division acquired its major competitor

and in 2 months transferred the entire operation, which supported 2,200 customers, from

Minnesota to Maryland. Another UCG division acquired ECHO, an electronic mortgage

transaction service which facilitates the processing of thousands of HUD mandated

forms daily. The systems that supported this operation included outsourced network

services, leased computer facilities and multiple versions of PC based user software. In

CCMI's case, all computer systems that supported all CCMI products, including billing

and collections, were evaluated at acquisition. Systems supporting CCMI documents

services were redesigned, while CCMI database management systems were retained.

Within 60 days of acquisition, CCMI was supporting customers and fulfilling all products

from the UCG Rockville office. This experience managing the "acquisition" of systems

will be especially critical in the CO Assignment transition, where each group has a unique

application to support code assignment.

Management Skills

The best evidence of management skill is the effectiveness of the organization in terms of

profitability, customer retention, employee development and turnover. By all measures,

CCMI and UCG are well qualified. We've been profitable and growing consistently since

we were founded. Our renewal rates (the most critical measure of customer satisfaction

in a subscription based business) at 84% are well above industry norms of 71%. CCMI's

managers have been with CCMI for several years, moved with the business to Rockville,

and helped recruit and train the current CCMI staff.

Project Management Skills/ Communications and Negotiating Skills - We've

addressed these two requirements simultaneously because they are so closely linked

and interdependent. CCMI receives the data used in its products from three primary

sources - telecommunications tariffs filed at the state and Federal level (generally these

are acquired via long-term contract with carriers), industry associations (e.g. NECA) and

regulators. Since we rely exclusively on these sources, maintaining positive , long term

relationships is one of CCMI's most critical activities. CCMI has successfully

managed this process for more than twenty years, through several major

restructurings of the industry, without interruption or deterioration in service.

Similarly, keeping our database products up-to-date in terms of coverage means we must

constantly add new services, new carriers, as well as adjust to new regulatory rules, all on

a predictable schedule our clients can rely on. We do this via a rigorous schedule of

product enhancements and updates and constant regular communication with clients. The

acquisition of data from a variety of sources and the integration of that information in our

products demand excellent interpersonal and negotiating skills, and focused project

management.

<u>Manage Proprietary Data</u> - Many of CCMI's clients compete with each other

in providing internet access, billing systems, and call accounting services. In the course of

doing business, CCMI has access to their proprietary customer lists. Our sales, service

and technical staffs recognize the sensitive nature of this information are trained to

keep the information confidential. In addition, many CCMI clients use our data in

proprietary systems or provide CCMI proprietary rates for inclusion in specialized custom

databases.

<u>Public Relations Skills</u>

As publishers, one of CCMI's primary tasks is to explain to our subscribers complex

information in a clear, concise and easy to understand way, while recognizing our

responsibility for editorial integrity and fairness. We understand that complex numbering

issues must be communicated to several industry sectors, especially a public sector that

can be easily confused. Fulfilling this obligation will be a logical extension of much of the

publishing activity CCMI performs every day.

3.1 Personal Resumes of Respondent's Personnel and Sub-contractors

George David - Director - CCMI
 Education: BBA - Economics, Pace University, New York, New York

MBA - Economics, Pace University, New York, New York

Mr. David has been with CCMI since 1985. He was President of CCMI
when it was acquired from McGraw-Hill in 1990, and managed the transition
and staffing of CCMI when the company relocated from New Jersey to Maryland.
Prior to joining CCMI, Mr. David spent seventeen years with AT&T and
New York Telephone in operations, engineering and marketing positions.
After leaving AT&T, he worked in the Network Design and Management
group of Mobil Corporation telecommunications department. Mr. David
serves on the Executive Committee of UCG.

Robert Koran - Partner, Chief Information Officer - UCG

Education: BS - Mathematics, SUNY- Albany, New York

MS - Computer Science, SUNY - Binghampton, New York

Mr. Koran has over 20 years experience in the Information Industry, with
particular expertise in the development, maintenance and refinement of electronic
information systems and services. As CIO, Mr. Koran is responsible for UCG's technical
infrastructure, including interoffice communications, telecommunications services and
computer services. Mr. Koran has been responsible for the introduction of every UCG
electronic information service, as well as the evaluation and assessment of exiting
systems at acquired companies. Mr. Koran serves on the UCG Executive and
Operations Committees.

Mitchell Barlow - Director Information Technology Operations - UCG

Education: BS - Computer Science, Boston University, Boston, Mass.

Mr. Barlow is responsible for centralized planning and coordinating computer

and telecommunications systems planning, implementation and maintenance

for all UCG divisions. Prior to joining UCG, Mr. Barlow spent seven

years as Director of New Technology and Network Services for the National Rural

Electric Cooperative Association. He also founded and managed his own

company, and was Chief, Division of Technical Services for the Montgomery County

(MD) Government. Mr. Barlow has been with UCG since early

1997, and serves on UCG's Operations Committee.

Todd Foreman - Chief Financial Officer - UCG

Education: BBB - Accounting, Emory University, Atlanta, Georgia

MBA - Finance, George Washington University, Washington, DC

Certified Public Accountant

In his capacity as Chief Finical Office, Mr. Foreman oversees UCG's

accounting, cash management, payroll, billing, circulation and insurance functions.

He managed the redesign and implementation of a new centralized billing system,

a new circulation system and new accounting system. Prior to joining UCG

in 1992, Mr. Foreman spent two years at KPMG Peat Marwick, and five years

with a national real estate consulting firm. Mr. Foreman serves on UCG's Executive

and Operations Committees.

Edward Sullivan - Manager of Tariff Acquisition and Analysis - CCMI

Education: BS - Information Management, Tennessee Tech, Knoxville, TN

Mr. Sullivan has been with CCMI since 1986. Prior to joining CCMI, Mr.

Sullivan was a Traffic Engineering Analyst for EDS. At CCMI, Mr. Sullivan manages

CCMI's staff of Tariff Analysts, who are responsible for acquiring tariff and rate data

and managing its representation in CCMI's products. Mr. Sullivan also provides

technical and industry support to all CCMI database clients.

Michael Cocchiarra - Manager of Technical Staff - CCMI

Education: BS - Computer Science, Ramapo College, Ramapo, New Jersey

Mr. Cocchiarra has been with CCMI since 1987. Prior to joining CCMI,

he worked at IBM as Systems Analyst. At CCMI, Mr. Cocchiarra manages

CCMI's technical staff, and is responsible for product delivery, systems maintenance

and design, and technical support for CCMI clients.

Please note, that in addition to the above staff, we will recruit personnel

who have experience in NANP and CO Code Administration.

Section 4.0 - NANP Administration Functional Requirements

4.1 General Responsibilities /4.2 NANP Number Resource Assignment and Administration.

The general responsibilities of NANP Administration fall into two categories, an administrative set of responsibilities and an advisory set of responsibilities. The administrative set of responsibilities, which include liaison and coordination with NANP member countries, must be performed in a fair, unbiased and non-discriminatory manner, and CCMI is well positioned to accomplish that goal. Advisory responsibilities require specialized, in-depth knowledge of numbering issues, coupled with a broad view of industry trends and issues.

To meet these responsibilities, we envision an organizational structure similar to that of the current NANP Administrator's, with a Director to manage long range issues, industry liaison, representation at study group and standards meetings, and regulatory interaction. The balance of the staff will provide day-to-day support to the industry, review and refer where appropriate, requests for numbering resources, manage the issuance of all reports, and maintain the NANP website.

Per the Requirements Document, CCMI will maintain and publish reports and statistics on each NANP area of responsibility. In addition, as part of the NANP transition, we will investigate the feasibility of consolidating the records for all number resources administered into one platform (e.g. Excel). Lastly, CCMI will accommodate changes to procedures/guidelines for existing NANP numbering resources, as well as new NANP numbering resources per industry and regulatory directives. Where appropriate, CCMI will recommend adjusted cost recovery in response to these changes to the NANC.

4.3 NANP Transition Plan

We understand the 90 day transition plan outlined in the Requirements Document represents an FCC mandated time frame; however, since our plan is to support NANP activities from our Rockville office, we would seek to implement the transition as quickly as possible consistent with providing ongoing service to the industry. A faster transition minimizes disruption to the industry, centralizes management and control in the new NANP quickly, and minimizes logistical and communications problems. Regardless of the actual transition time, we agree that during the last thirty days the current NANPA should be available for consultation, and we welcome industry comment and input regarding performance during the final thirty day period.

Section 5.0 - Central Office Code Administration

5.1 General Responsibilities

CCMI, in the course of collecting tariff data, monitoring rate case activity and resolving client questions has a working relationship with state regulators. However, we recognize the importance of a firm understanding of the total local environment. While our initial preference, solely for operation considerations, is for a single central staff, it may not be a feasible approach. We view this issue as the single most critical question to be resolved, and it must be resolved early in the CO Code transition process since the geographical structure of the organization will dictate much of the plan. Our proposal includes a provision for a CO Code Transition manager, to be in place coincident with the start of the NANP transition. The manger's first responsibility would be to assess, via interviews with current code administrators and local regulators, the most efficient organizational structure for CO Code assignment. This recommendation would be used to develop the CO Code transition plan.

5.2 Central Office Code Administration Functional Requirements

CCMI currently maintains data on CO Code assignment via our QTEL Rate Center File Products. These files are sourced primarily through AT&T FCC Tariff #10 and NECA FCC Tariff #4, augmented by the General Exchange tariffs of ILECs. The General Exchange tariffs are also used to maintain our QTEL Local Calling Area database files. The maintenance of these files gives CCMI a solid working knowledge of the local exchange market. That background, coupled with industry guidelines and established procedures will allow CCMI to meet the requirements for Client Services, CO Code Request processing, Industry Notification Functions (Note: CCMI does not currently

provide input to RDBS and BRIDS; access will be arranged coincident with selection), NPA Relief Planning and Jeopardy NPA Processes.

5.3 Central Office Code Transition

5.3.1 Basic Planning Information

Since the CO Code Transition Plan is not yet developed or approved our responses in this section are based to a large extent on general operating principals and on an organizational structure we feel would be the most efficient and effective. We recognize it is likely to change based on the work of the NANPA, the CO Code Transition Task Force and the NANC.

As with NANP Administration we view CO Code Administration as having two distinct aspect. The first, CO Code Assignment is primarily administrative, and can be managed by a centralized staff where economies can be realized, a high level of custom service can be provided, training and supervision is maximized and performance monitoring and evaluation is more easily accommodated. The second aspect, encompassing NPA Relief Planning and NPA Jeopardy Processes, requires a high degree of coordination, meeting planning and travel, regulatory review and testimony and interaction with local carriers. While some economies may be realized, the nature of these activities is that each has its own unique circumstances and problems. As such, we envision, at a minimum, a centralized staff organized around specific regions (e.g. exchange carriers territories). This would afford the opportunity to become familiar with specific regulators, companies, and demographics and geographic characteristics; alternatively, a decentralized structure with regional representation for these activities may be a more cost effective and efficient long term solution.